

Air Permit Exemption for Auto Body Refinishers

SBCA-APG6-0801

Many smaller businesses around Wisconsin were required to submit air operation permit applications to the Wisconsin Department of Natural Resources (DNR) by the end of 1998. Because auto body shops generate air pollution from the paints, solvents, adhesives and other materials used, shop owners were expected to meet this 1998 deadline and should have applied to the DNR for an air permit. After further review, the DNR determined it was appropriate to add an exemption for auto body refinishing shops from the air permit requirements.

Background

Any type of business releasing emissions into the air needs to apply to the DNR for an air permit, unless they can show they are exempt. Operation permits apply to existing facilities and construction permits are required for new or expanding facilities.

DNR Takes Closer Look at Shops

When creating its permit requirements, the DNR did not intend to regulate smaller sources such as auto body shops. DNR realizes that auto body refinishing facilities are traditionally small businesses. These smaller businesses usually have actual VOC emissions below major source* (see side bar) thresholds. DNR also realizes that staffing and workload constraints would not allow the agency to effectively permit and inspect a large number of additional sources. Several body shop representatives, the Wisconsin Automotive Collision Technician Association Ltd. (WACTAL) coating suppliers and the Small Business Clean Air Assistance Program provided the DNR with input on possible rule revisions.

Summary of the Exemption

The permit exemption level is 1,666 pounds of VOCs per month, prior to entering any control device. This number reflects a facility's ACTUAL emissions, based on the amount of VOC containing material actually used. This amount can never be exceeded or the exemp-

Do You Know if Your Shop is a Major Source*?

A body shop that has the potential to emit more than 100 tons per year of VOCs (Volatile Organic Compounds) is considered a major source. Major sources of air pollution are required to apply for air permits.

If your shop is located in a nonattainment area* and you have the potential to emit 25 tons of VOC per year, you would be considered a major source.

A shop could also be considered major if it emits 10 tons or more of any single hazardous air pollutant (HAP) or 25 tons per year of any combinations of HAPS.

tion will no longer apply and an air permit would be necessary. The exemption will apply to both construction permits and operation permits, so a new facility would not need a permit if it meets this exemption criterion.

How Do I Calculate VOC Emissions?

To find out if you are exempt, you will need to do some calculations.

① Find records of the amount of materials containing VOCs you use each month. You should be able to get this information from your supplier if you don't retain your own records. (You should look at the months with the highest coating usage.)

② Get copies of the Material Safety Data Sheets (MSDS) for each material you use. These would also come from your supplier. Look under the Physical Characteristics section of the MSDS and be sure it has either:

- VOC content in pounds per gallon (lb/gal)
- VOC content in percent (%) by weight (wt) and Density of Coating in lb/gal.

If you do not have the value for VOC content in lb/gal, you should be able to get that information from your supplier. They should know the VOC content of the materials they are supplying to you.

③ Once you have the VOC content in lb/gal, you can calculate the VOC emissions. Multiply the VOC content by the amount of coating used that month, in gallons and you have pounds VOC per month for that coating. If you used 100 gallons of the coating with 5.6 lb VOC for one month:

$100 \text{ gallons per month} \times 5.6 \text{ pounds VOC per gallon} =$ $\mathbf{560 \text{ lbs VOC/mo}}$
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④ Do this calculation for every paint, solvent, adhesive, etc., you use in the month. (Remember to include VOCs from clean up solvents directly related to the process, like gun cleaner for painting operations.)

Add up the VOC emissions from all the coatings and solvents used to get the total VOC emissions in pounds per month. If this total is less than 1666 pounds per month, you are exempt from an air permit. You'll need to keep these records on site to show you are not required to have an air permit.

What if I'm Over the Exemption Level?

If you exceed the 1,666 pounds of VOC exemption level you need to apply for an air permit with the DNR or explore ways to reduce the amount of VOCs emitted from your shop (pollution prevention).

To Apply for an Air Permit

If you are not exempt from the permit requirements, contact the DNR or Small Business Clean Air Assistance Program (SBCAAP) to get the permit application materials and instruction booklet. SBCAAP has a fact sheet that lists DNR contacts by regional location and area of expertise. If you have questions about how to complete the forms you can contact DNR or the SBCAAP for help.

Pollution Prevention Options

By reducing the amount of VOCs your shop emits into the air, you are not only avoiding the permit process, you are helping to improve the environment and the air you and your family breathe. Some common (and simple) pollution prevention (P2) options include:



- Using paints and related products that emit fewer VOCs. Products with less solvent either have a higher solid content or have replaced as much solvent as possible with water or exempt solvents.
- Improving paint delivery systems/application equipment. High volume, low pressure (HVLP) spray equipment uses less air at higher pressures to deliver the paint. This reduces the amount of material used on each job as well as reduces overspray and "bounce back."
- Keeping solvents and paints in closed containers to reduce evaporation.

Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.



For further information on the Auto Body Refinishing permit exemption contact your DNR Regional or Service Center office shown on the DNR Contact Fact Sheet or the DNR's Central office at 608/267-7541.